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9/19/1988

CHEMICAL PROCESSORS, INC.
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SEATTLE, WASHINGTON 98134

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CONTINGENCY PLAN

PIER 91 FACILITY

CHEMICAL PROCESSORS, INC.
PIER 91
SEATTLE, WASHINGTON 98119

EPA ID# WAD000812917

Revised October 6, 1987
Revised September 19, 1988

CHEMICAL PROCESSORS, INC.
PIER 91 CONTINGENCY PLAN

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PIER 91 FACILITY

1. CONTINGENCY PLAN OBJECTIVES

The objectives of the Pier 91 Contingency Plan are to minimize hazards to human health or the environment from fires, explosions or any unplanned or non-sudden release of hazardous wastes or hazardous waste constituents. This plan also applies to the management of hazardous materials which may require preventive and responsive actions on the part of Chemical Processors, Inc. The Contingency Plan will be implemented should an emergency occur which threatens human health or the environment.

2. FACILITY DESCRIPTION

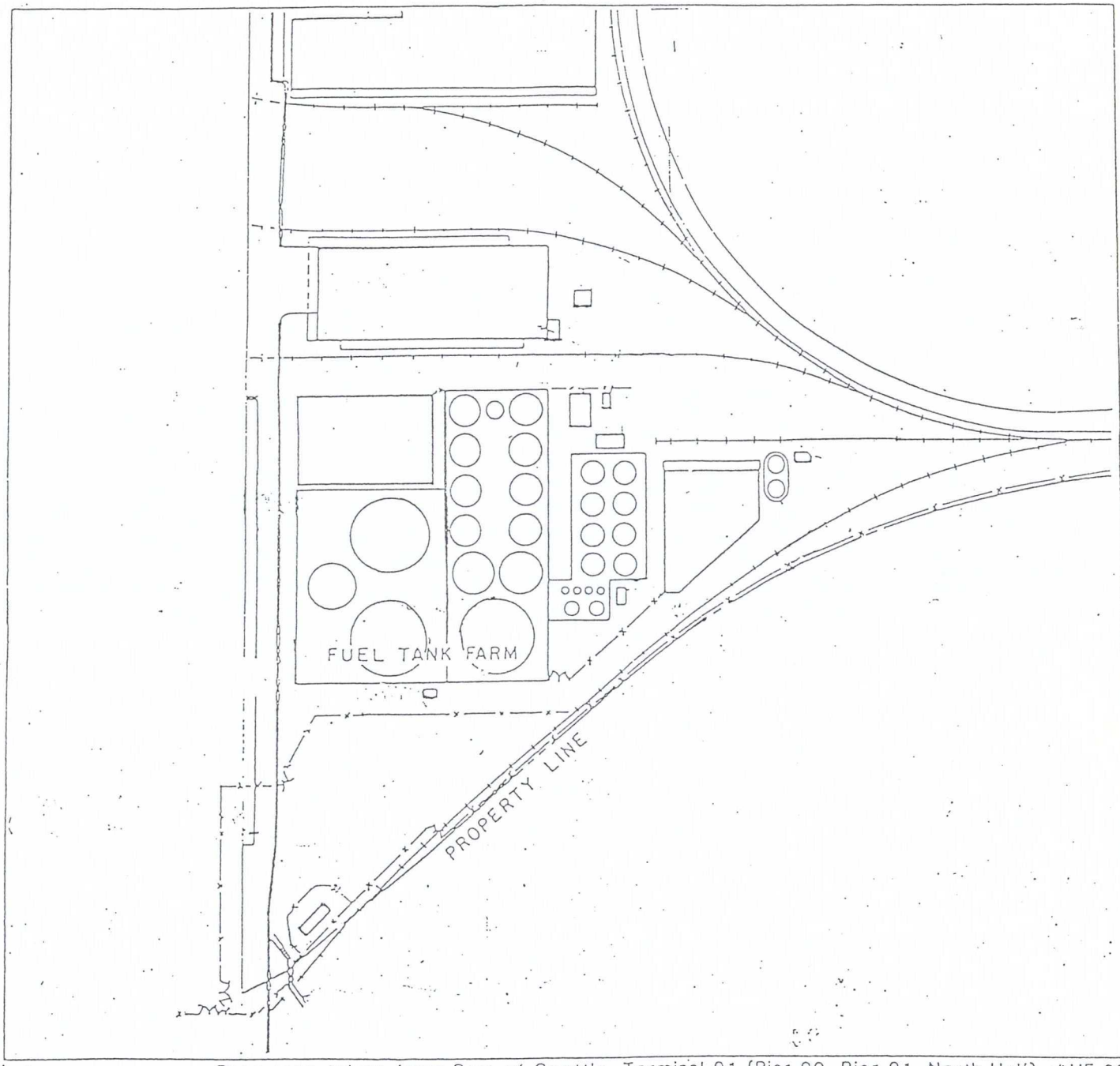
The Pier 91 facility is a former U.S. Naval facility located on the northern waterfront of Elliott Bay. Pier 91 has developed into a main bunkering and recycling terminal, handling bilge and ballast waters received by barge and tanker trucks. A major portion of the 8,000,000 gallon complex is leased as a marine fuel depot by Pacific Northern Oil. Pacific Northern Oil personnel will be immediately notified if a situation arises which threatens health, property or the environment.

The maximum capacity of Pier 91's waste oil reclamation and oily industrial liquid waste treatment operations is 8.5 million gallons. Waste oil is rendered resusable by tank treatments such as separation of impurities and breaking emulsions. All the processed oil is currently sold to Pacific Northern Oil as cutting stock in marine oils. Pier 91 also treats liquid wastes contaminated with low level heavy metals and/or other low concentration hazardous wastes which can be treated to render the liquids non-hazardous. Generally the waste types received at the facility include oils, oily sludges, emulsified oil and water, oily water, coolants and non-oily water.

The site plan (Figure 2-1) shows the tank locations and describes the tank contents.

Site Plan

Figure 2-1



Base map taken from Port of Seattle, Terminal 91 (Pier 90, Pier 91, North Half) ,#MF-22.

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Operations at Pier 91 currently require 6-10 employees working two shifts, five days per week.

Security at the Pier 91 complex is maintained by a fence and security gate manned by Port of Seattle guards at all times. The facility is adequately lighted for visibility to allow for unobstructed movement of personnel and fire or spill control equipment in an emergency.

3. FACILITY DRAINAGE

All property at Pier 91 which is not bermed is sloped to drain runoff to collection sumps (Refer to Figure 3-1). Drainage of bermed tank farm area is diverted to sumps within the berm. Stormwater is received into the oil/water separator, treated discharge is by permit to Metro sewer. An oil/water photocell monitor sounds an alarm if permitted levels are exceeded and automatically closes off discharge.

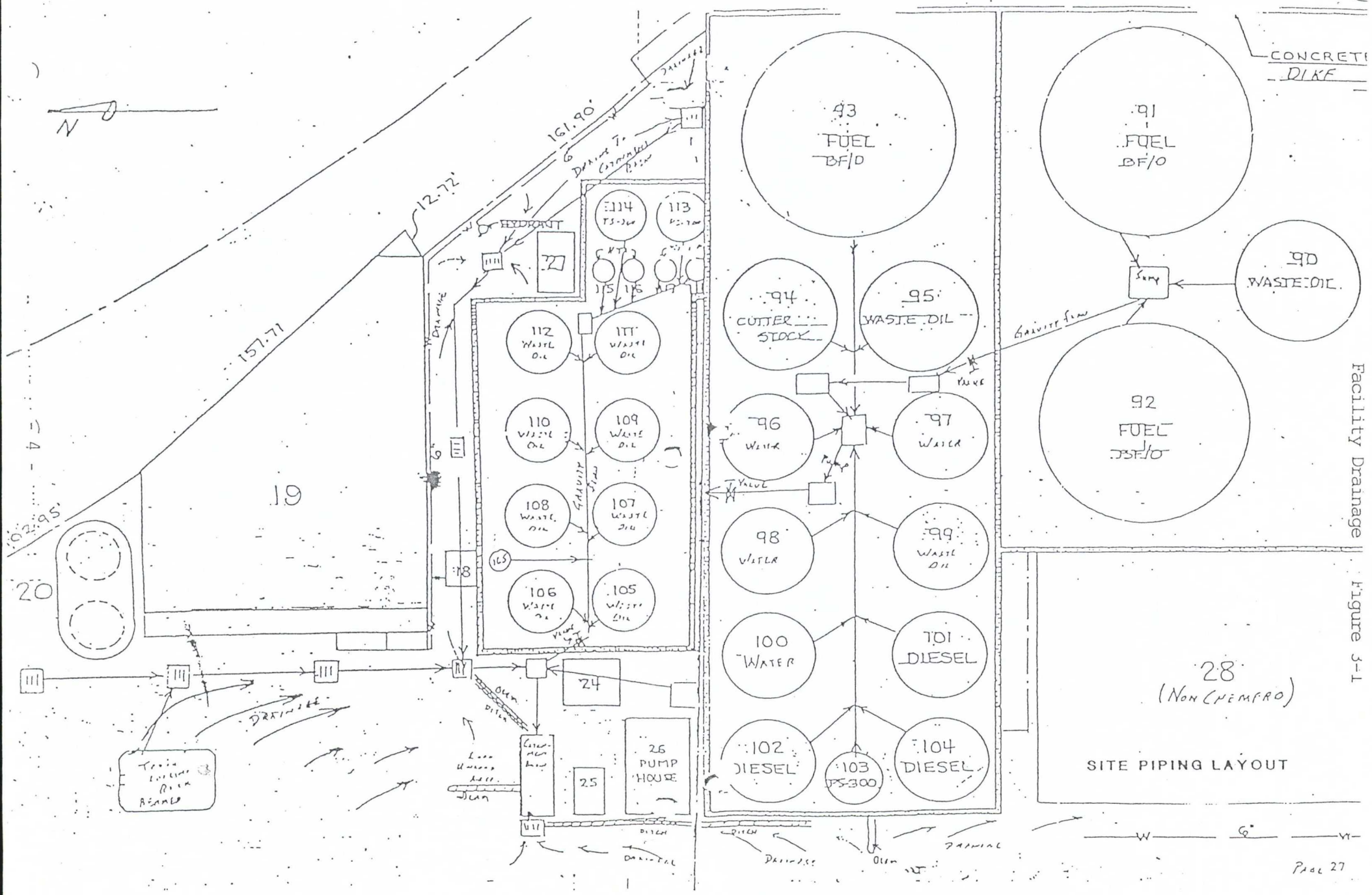
4. EMERGENCY COORDINATOR

The Emergency Coordinator has the primary responsibility to initiate and coordinate all emergency response procedures. The Emergency Coordinator, or Alternate, has complete authority to commit needed resources of the company in the event of an emergency. During normal week day operations the Primary Emergency Coordinator, or Alternate is on duty between 8 am to 4:30 pm. Outside of normal work hours, the Primary and one of the Alternate Emergency Coordinators are capable of being reached on a pager. Emergencies reported after hours to the office number 223-0500 will be answered by Kelley's Telephone Answering Service. The answering service will in turn contact the Primary or Alternate Coordinators at home or on the pager for a response to the Emergency. Listed below is a list of the Primary Emergency Coordinators and Alternates listed in the order in which they assume Alternate Coordinator responsibility.

<u>Primary Emergency Coordinator</u>

1. Nate Matthews

8437 - 35th S.W.
Seattle, WA 98126
Office (206) 284-2450
Pager 997-6215
Home 937-7419



Facility Drainage

Figure 3-1

Alternate Emergency Coordinators

2.	Hector Gamboa	19819 64th NE Seattle, WA 98155 Office (206) 284-2450 Home 485-0142
3.	Ron Atwood	13003 SE 188th Place Renton, WA 98058 Office (206) 223-0500 Pager 997-6216 Home 226-8745

5. IMPLEMENTATION OF THE CONTINGENCY PLAN

The Contingency Plan will be implemented when a fire, explosion or spill incident presents a threat to human health or the environment. The Emergency Coordinator will use his judgment to determine when to initiate the plan. The following emergencies might call for the implementation of the Contingency Plan.

a. Fire/Explosion anywhere on premises.
b. On site and off site release of oil, hazardous wastes or hazardous materials.
c. The occurrence of natural disasters.

Listed below are more detailed exemplary incidents which could occur at the facility which may threaten human health or safety and the environment and require implementation of the Contingency Plan.

Fire

- A fire in which the use of water or water and chemical fire suppressant could result in contaminated runoff.

Material Release

- A spill which poses a safety hazard due to exposure to the spilled material or vapors.

- A spill onsite which has been contained yet the potential exists for contamination of groundwater.

- A spill which can not be contained on site, resulting in off site soil or surface water or potential ground water contamination.

Natural Disaster

- A disaster event in which the contingency may be implemented might include damage to equipment, foundations, structures or tanks due to an earthquake or sever flooding conditions.

- Overturned or damaged tanks due to severe storms involving high velocity winds or lightning.

- Damage to equipment, foundations, structures or tanks due to earthquake or a volcanic eruption.

- Damage to equipment, tanks and structures due to severe flooding conditions resulting in a hazardous materials release to the environment.

6. EMERGENCY RESPONSE PROCEDURES

6.1 Employee Response

- Any employee, when faced with an actual or imminent emergency, will first attend to his/her safety, and if conditions are safe to do so, attend to other employees requiring immediate assistance.

- Fire/Explosion

  Any employee discovering a small fire will attempt, in his/her best judgment, to extinguish it with the fire extinguishers available throughout the facility (Extinguisher Locations

(Foam Outlet Locations are outlined in Figure 6-1 and extinguisher locations are identified in Section 7). Responses to any emergencies will only be conducted if appropriate protective equipment is worn by the employee. When fire is extensive or if an explosion occurs, the employee is instructed to employ the following procedure (only after personal and coworker safety is secure):

- Shout "FIRE" Warning.
- Stop all transfers by closing appropriate valves and pumps.
- Use nearest phone - dial 911 for fire department and other needed assistance.
- Start foam pumps - open valves to appropriate tanks at the appropriate foam outlet. Use 2 way radios for communication if needed.
- Isolate materials or containers away from fire, when possible.
- Attempt to contain spills or runoff.
- Immediately notify emergency coordinator.

All employees, in the event of a large fire must first close down and secure equipment in use and immediately proceed to the designated meeting area in front of the warehouse building to await further instructions from the Emergency Coordinator. The Emergency Coordinator or designated person will determine if all employees are present and not injured or trapped in a fire.

- Spills

In the event of a small hazardous waste or hazard material spill, the source will be immediately located and eliminated and the spill contained immediately with equipment at hand. In cases where an employee needs immediate assistance in controlling a fire or spill he/she will signal by any means possible including hands, voice or phone. If the spill cannot be controlled, the Emergency Coordinator is to be immediately notified and contractor assistance will immediately be arranged.

6.2 Emergency Coordinator Response

6.2.1 Emergency Incident Assessment. The Emergency Coordinator will immediately assess the situation to determine appropriate emergency response actions. An assessment of the severity and nature of the incident will be evaluated and the character, source and amount of released materials will be identified. The selection of appropriate response action will depend on a consideration of the following factors and the conditions outlined in Section 8 Implementation of the Contingency Plan.

a. The severity and nature of the incident (fire, explosion, and/or waste or oil spill).

b. The potential of severe consequences. What is the location of the incident and to what extent to which other areas may become involved?

c. The current weather conditions (temperature, wind direction and velocity). How could they affect response activities?

6.2.2 Emergency Response Notification. The Emergency Coordinator must contact Regulatory Affairs in the event of any emergency. If it is determined that a fire, explosion or hazardous waste or substance release threatens human health and safety or threatens the environment outside the facility, the National Response Center (800-424-8802) and the Washington Department of Ecology (206-867-7000) will be immediately notified and provided with details of the indicent as indicated on the Notification Report form. A sample spill report form is provided in Figure 6-1. Local authorities will be notified as appropriate as outlined in the Emergency Response Notification Procedure flow charts on Figure 6-2. In some instances it will be

difficult to determine whether or not a spill should be reported to the authorities. The Emergency Coordinator must notify Chemical Processors, Inc.'s Regulatory Affairs Department of all spills. Regulatory Affairs will assist in the evaluation of the spill to determine notification procedures. The Emergency Coordinator must identify to Regulatory Affairs the type of material spilled, the amount and the location. For example, if the spill occurs in soil instead of occurring on a concrete pad, reporting notification may be required. As a general guideline, notification to the National Response Center is required for the release of a hazardous substance in a quantity equal to or greater than the 'RQ' value listed in CERCLA Part 302 Table 302.4. Section 102(b) of CERCLA sets a 'RQ' value of 1 lb for all those hazardous substances which do not have reportable quantities established pursuant to section 311(b)4 of the Clean Water Act. For all occurrences, the Emergency Coordinator will contact Regulatory Affairs for an evaluation of the severity of an incident and for a determination of notification.

HAZARDOUS MATERIALS AND DANGEROUS WASTE

SPILL REPORT FORM

This information is required reporting information for the National Response Center (800) 424-8802 and for the Washington Department of Ecology (206) 867-7000.

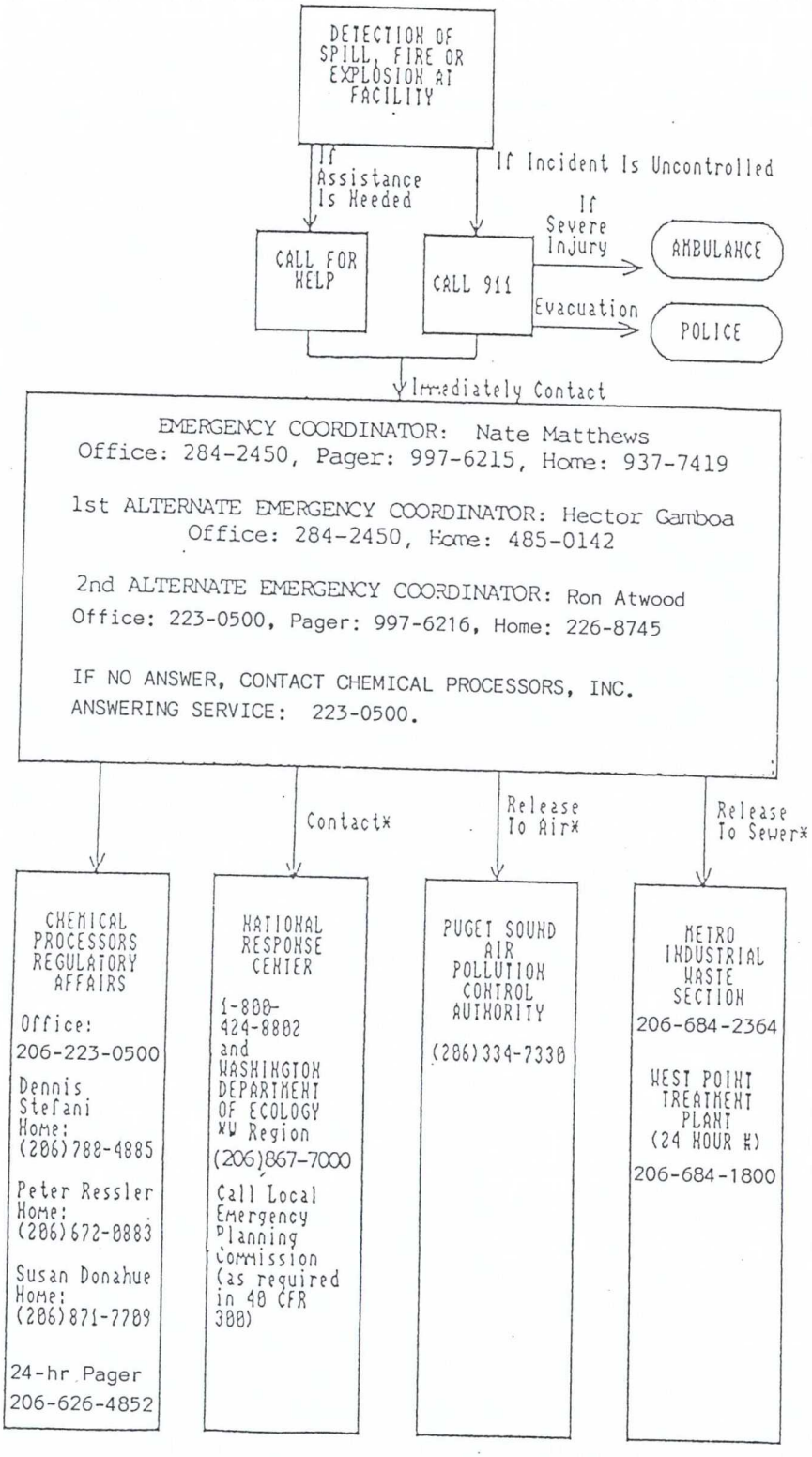
NAME AND LOCATION OF FACILITY:		
NAME OF REPORTER:		
PHONE NUMBER WHERE REPORTER MAY BE LOCATED:		
DATE:	TIME:	LOCATION:
TYPE OF INCIDENT (Spill, Gas Leak, Etc.)		
IDENTIFICATION OF MATERIAL:		QUANTITY:
EXTENT OF INJURIES:		
POSSIBLE HAZARDS TO ENVIRONMENT:		
OTHER COMMENTS:		

Figure 6-1

FIGURE 6-2

CHEMICAL PROCESSORS, INC.
PIER 91 FACILITY

EMERGENCY RESPONSE NOTIFICATION FOR FIRE, EXPLOSION AND MATERIAL RELEASE



*The Emergency Coordinator will contact these agencies if it is readily determined that the emergency threatens human health and the environment outside of the facility.

6.3 Containment and Control

Listed below are Chemical Processors' emergency response tactics to minimize the impact of emergency incidents. The Environmental Coordinator will commit all necessary resources of the company and may also call upon the services of Crowley Environmental Services (206) 682-4898 or 583-8100.

6.3.1 Injured or Endangered Employees

- Use appropriate protective clothing and equipment before rescuing injured employees.
- Use hand, voice signals or alarm.
- Apply first aid. A first aid kit is located in the office of Warehouse Building 18 and 19.
- Phone 911 number for ambulance if needed.

6.3.2 Spills in Loading and Unloading Area

- Always use appropriate protective clothing and equipment.
- Shut off all pumps.
- Close valves.
- Utilize absorbent materials to stop flow.
- Pump sumps containing a spill to oil water separator or an appropriate treatment tank.

6.3.3 Ruptured and Leaking Tanks

- Use appropriate protective clothing.
- Provide for containment of spill if containment berms have been damaged.
- Transfer contents of leaking tank to another appropriate tank after quantity of material has been determined.

- Transfer any spilled material contained in sumps or bermed area.

- Monitor for leaks during transfer.

- Assess reason for leak or rupture.

- Procedures for tank repair -

  a. Transfer material from tank to another compatible tank.

  b. Steam clean tank.

  c. Capture condensate water for treatment.

  d. Air ventilate for 24 hours.

  e. Use volatile organic vapor detector to assure that no volatile vapors are present.

  f. Patch tank. All welding of tank is done on the outside. Tank bottoms may be welded from the inside once item (d) above has been proven and once an entry permit by an outside contractor has been provided certifying the tank is okay for welding.

6.3.4 Ruptured Lines

- Use appropriate protective clothing and equipment.

- Immediately cutoff flow.

- Pull back suction on ruptured line to clear line of material.

- Provide for containment of spill. Transfer to an appropriate tank any spilled material contained in sump or bermed area.

- Assess reason for leak and replace/repair pipeline.

6.3.5 Freezing Weather Conditions

Accidental spillage resulting from frozen pipelines may be eliminated by heat tracing and continuous circulation loop using warm or hot product involving all line-ups.

6.3.6 Flooded Conditions

- Use appropriate protective clothing and equipment.
- Eliminate ignition sources, shut down operations - cut off pumps and valves.
- To prevent damage from floodwater use sandbags to dike area around building. Use portable pump to pump excess water. If pumped water is contaminated, pump to an appropriate tank or pump to tank truck.

6.4 Clean Up, Recovery and Follow Up Actions

The Emergency Coordinator will be responsible for the following activities associated with the clean up and recovery of all emergency events.

- Use of appropriate protective clothing and equipment by employees during clean up operations.
- Recovery of uncontaminated materials.
- Recycling of contaminated material, when possible.
- Proper identification, packaging and recordkeeping for the treatment or disposal of hazardous waste, recovered wastes, contaminated soil or surface water.
- Cleaning and replenishing all emergency equipment.
- Restoration of damaged areas.
- Investigation of the cause of the event. Revisions to operations, Contingency Plan or training will be implemented to prevent reccurrence of such an incident.

If the facility operations stop due to a fire, explosion or release, the Emergency Coordinator will monitor for leaks, pressure buildup, gas generation or ruptures in valves or pipes. Monitoring of the effected tanks will consist of a visual observation at

no more than 10 minute intervals until the emergency is ended. Pipes and valves associated with the tanks will also be visually observed for ruptures or leaks at 10 minute inspection intervals.

7. EMERGENCY EQUIPMENT

The list below describes all emergency equipment available at the facility. Figure 7-1 illustrates the locations of fire control equipment. The foam system is inspected and tested by the fire department on an annual basis. Analysis of the foam condition is also conducted periodically. Fire extinguishers are re-charged by Alexander Gow Inc. on a quarterly basis. The fire department also inspects the water systems and sprinkler system (PANOCO) on a yearly basis.

EMERGENCY EQUIPMENT LIST

Emergency Equipment	Quantity/ Description	Location
Communications	Alarm	
	6 Telephone/ Intercom Units	3 in Main Office 2 in UDO Office 1 in Operations Office
	3 2-Way Radios for barge offloading and tank transfer use	1 in Main Office 2 in Operations Office
Fire Control Equipment	Foam System consisting of foam pump station, two water tanks and 8 foam outlets. Foam may be directed to any tank by valve adjustment.	See figure 7-1 for locations of foam outlets
	5 Water Hydrants	See figure 7-1 for locations
	Fire Extinguisher: ABC Dry Chemical Type 10-20 lb sizes	- 9 in office and warehouse - 1 in boiler room (PANOCO) - 1 in load/ unload area - 1 in PANOCO Bldg 24 - 1 in PANOCO pump house - 1 in operations house - 1 in foam pump house

EMERGENCY EQUIPMENT LIST

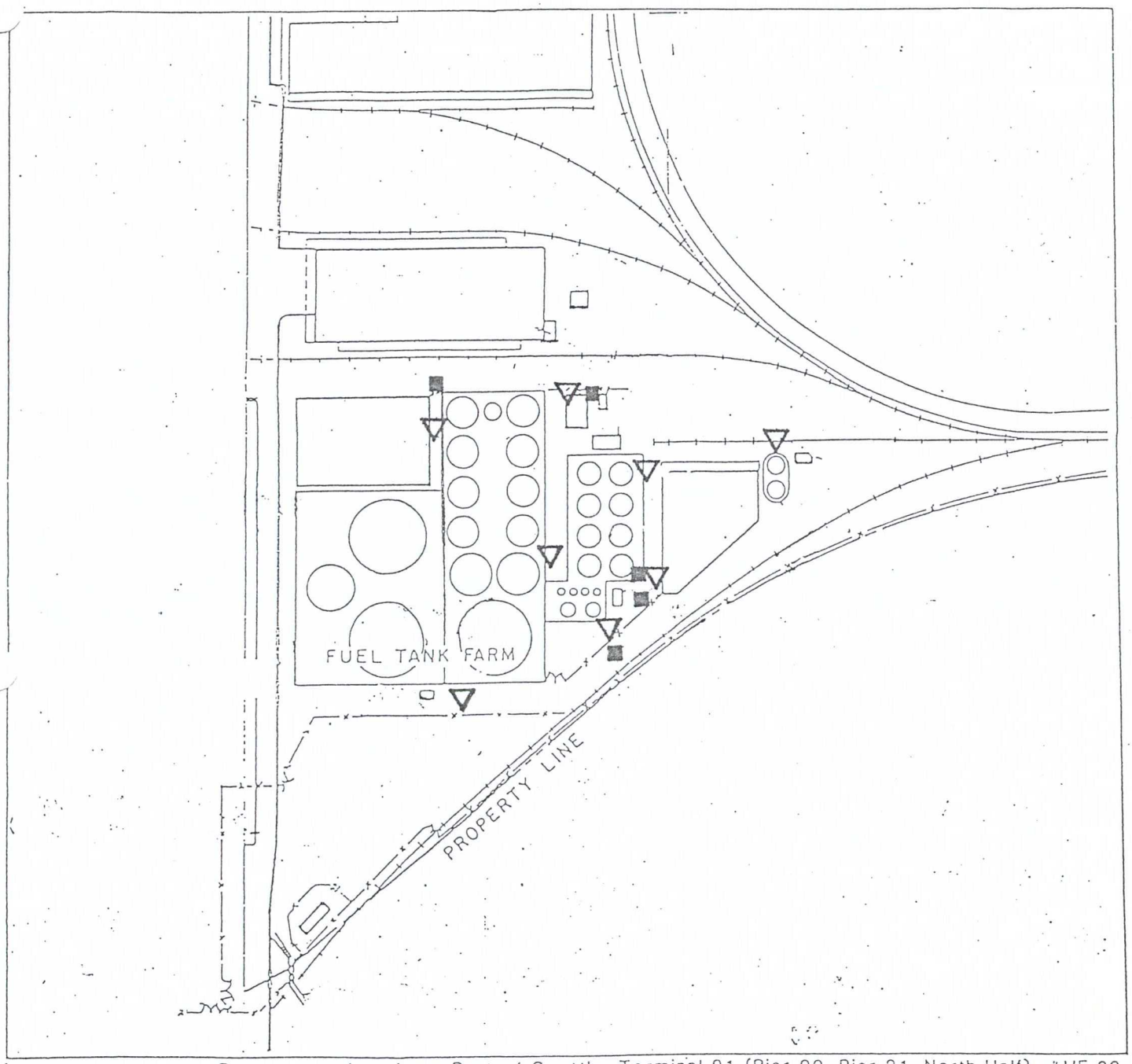
Emergency Equipment	Quantity/ Description	Location
Spill Control Equipment	Transfer hoses and pumps	5 lined on top of oil/water separator
	Drip pans: 5-10 gallon capacity metal and plastic. Used for transfers	Stored in oil/water separator area
	Absorbent material 50 lb bags. Usual stock ranges 1/2 to 1 ton	Warehouse
	Sumps	Located inside tank, treatment, and unloading areas
	Hand tools, shovels	Maintenance room next to Operations office
Protective Equipment	Hard hat Goggles Face shields Cannister respirator Cannister cartridges Gloves Boots Rain Gear	Each employee is issued a set of protective gear, stored in personal locker Supplies in main office

EMERGENCY EQUIPMENT LIST

Emergency Equipment	Quantity/ Description	Location
Medical Emergency Equipment	4 Eye Wash Stations	- 1 in main office lab
		- 1 in observation office
		- 1 outside wall adjacent to office
		- 1 by tank 110
	2 Showers	1 in warehouse bathroom
		1 in locker room
	2 First Aid Kits	1 in main office lab
		1 in operations office
Other Equipment Used for Emergencies	Electrical Controls	Electrical shed
	1 Forklift	Warehouse

Fire Control Equipment Locations

Figure 7-1



Base map taken from Port of Seattle, Terminal 91 (Pier 90, Pier 91, North Half) ,#MF-22.

▽ Foam Outlet

■ Hydrant

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8. COORDINATED EMERGENCY SERVICE AGREEMENTS

Seattle Fire Department (206) 625-4091

City of Seattle
301 Second Avenue South
Seattle, Washington 98104

The Seattle Fire Department will be the first to respond to emergency fire, explosion or spill events at the facility. The fire department is familiar with the Pier 91 facility operations and conducts annual inspections. The Seattle Fire Department also directs the Medic One medical response teams. The hospital and police are contacted as needed in the instance of injury or evacuation via the 911 system. The need for evacuation of surrounding areas will be determined by the fire department with the advice from the Pier 91 Facility Emergency Coordinator. The Seattle Fire Department has received a copy of the current Pier 91 facility plan.

Washington Department of Ecology (206) 867-7000
Emergency Calls (24 hours)

Northwest Regional Office
4350 150th Avenue N.E.
Redmond, Washington 98052

Chemical Processors will immediately contact the Washington Department of Ecology when the Emergency Coordinator and the Regulatory Affairs department determine that the emergency notification is to be implemented. All necessary information will be provided per WAC 173-303-360. A copy of the Contingency Plan has been sent to the department.

U.S. Coast Guard Notified through NRC 1-800-924-8802

Commanding Officer
U.S. Coast Guard
Marine Safety Office/Puget Sound
1519 Alaskan Way South
Seattle, Washington 98134-1192
Attn: Port Operations

The On-Scene-Coordinator has designated emergency response to the above address for spills occurring in the port area. The Pier 91 Emergency Coordinator will contact the U.S. Coast Guard through the NRC emergency number. The Coast Guard has received a copy of the contingency plan.

Washington Department of Ecology (206) 867-7000
Emergency Calls (24 hours)

Northwest Regional Office
4350 150th Avenue N.E.
Redmond, Washington 98052

Chemical Processors will immediately contact the Washington Department of Ecology when the Emergency Coordinator and the Regulatory Affairs department determines that emergency notification is to be implemented. All necessary information will be provided per WAC 173-303-360. A copy of the Contingency Plan has been sent to the department.

Metro

821 Second Avenue
Seattle, WA 98104

(206) 684-2328 Metro Industrial Waste Section
7:30 - 4:00 Mon-Fri
(206) 684-1800 West Point Treatment Plant

Metro will be contacted in the event of an emergency release of hazardous materials/waste to the sewer system. Metro has received a current copy of the Contingency Plan.

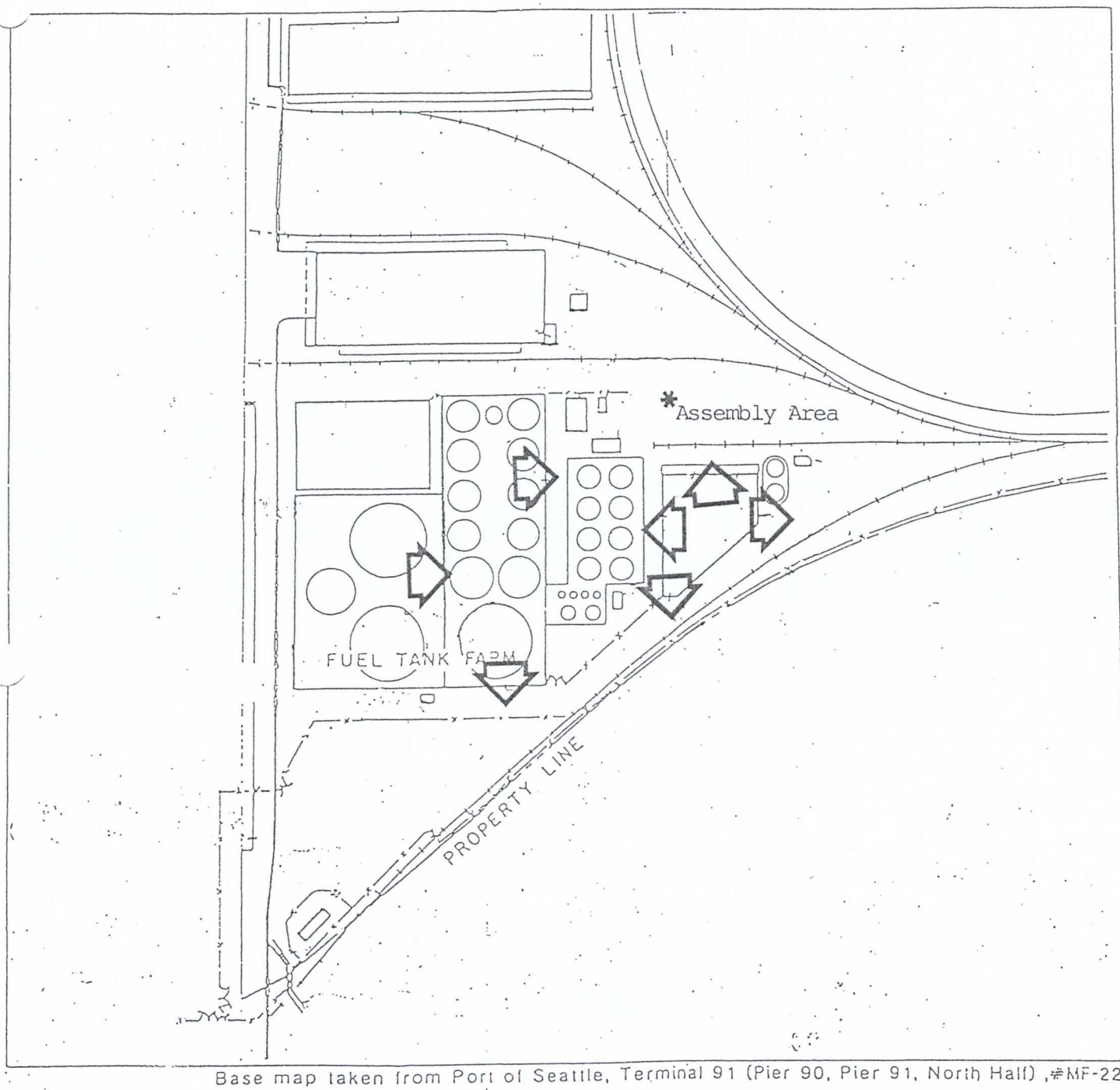
9. EVACUATION PLAN

In the event a fire or release of a hazardous material could endanger the lives of persons in and outside the facility, evacuation will occur and the following procedure will be followed:

- All employees will be immediately notified by voice and visual signals of the emergency.
- Each person is instructed to meet at the designated assembly area outside the warehouse. If this area is downwind of potentially hazardous emissions, employees must assemble in an alternate upwind location (refer to Fire/Explosion Evacuation Route Diagram).

Evacuation Routes

Figure 9-1



Base map taken from Port of Seattle, Terminal 91 (Pier 90, Pier 91, North Half), #MF-22.

Exits

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- At the assembly area, the Emergency Coordinator or designee will account for all persons. Call Emergency 911.

- The Fire Department will determine in conjunction with the Emergency Coordinator, the necessity to evacuate beyond the facility premises.

10. INCIDENT REPORTS

After an emergency episode requiring the complete implementation and notification outlined in the Contingency Plan, Chemical Processors, Inc. will complete the following notification requirements:

a) The Emergency Coordinator or Regulatory Affairs will immediately notify a reportable release per procedures described in Section 6.2 of the Contingency Plan. This would include required notification of a reportable quantity to the Local Emergency Planning Commission and the State Emergency Planning Commission as required by 40 CFR 300.

b) The Emergency Coordinator upon consultation with Regulatory Affairs will notify the Washington Department of Ecology that the facility is in compliance with WAC 173-303-360(2)(i) which specifies that before facility operations are resumed the Emergency Coordinator must ensure that:

- No waste that may be incompatible with the released material is treated or disposed of until clean up procedures are completed.

- All emergency equipment used for the emergency is cleaned and fit for its intended use before operations are resumed.

c) Chemical Processors, Inc. will submit to the Washington Department of Ecology, within 15 days, a report detailing the following:

- Name, address and telephone number of owner.
- Name, address and telephone number of facility.
- Date, time and type of incident (e.g. fire, explosion).
- Name and quantity of materials involved.
- Extent of injuries.
- An assessment of actual or potential hazards to human health or the environment, where applicable.
- Estimated quantity and disposition of recovered material that results from the incident.

d) Chemical Processors, Inc. will submit information as outlined in 40 CFR 300.94 to the Local and State Emergency Planning Commissions. The information shall include an update regarding:

1)
- Chemical name or identity.
- Is chemical an extremely hazardous substance list (302a)
- Estimate of quantity released.
- Time and duration of release.
- Any known acute or chronic health risks associated with the release.
- Advice for medical attention to exposed persons.
- Name and telephone number of contact.

2) Actions taken to respond to the release.

e) Chemical Processors, Inc. will submit to Metro a report of an unpermitted discharge containing the following information:

1) Description of equipment breakdown.

2) Quantity and quality of waste discharged.

3) Corrective action taken.

4) Preventative steps taken to prevent a recurrence.